

# EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

TRIAL COURT OF MASSACHUSETTS  
SUPERIOR COURT DIVISION  
CIVIL ACTION. NO.:

SABRINA DIX-ADAMS      )  
Plaintiff                )  
                          )  
V.                        )  
                          )  
LINDSEY LAPIDES &     )  
ANHEUSER BUSCH, LLC    )  
Defendants              )

COMPLAINT AND JURY DEMAND

1. Plaintiff Sabrina Dix-Adams is an individual domiciled at 23 Blueberry Hill Road, Raymond, New Hampshire.
2. Defendant Lindsey Lapides is an individual domiciled at 9 Bowman Street, Dorchester, Suffolk County, Massachusetts.
3. Defendant Anheuser Busch, LLC is a corporate entity with a principle place of business of 1 Busch Place, 2025, St. Louis, Missouri.
4. Jurisdiction over the person of the Defendant, Anheuser Busch, LLC is based upon the following:
  - a) The Defendant's transacting business in the Commonwealth of Massachusetts;
  - b) The Defendant's contracting to supply services or things in the Commonwealth of Massachusetts;
  - c) The Defendant's causing tortious injury by an act or omission in the Commonwealth of Massachusetts; and/or,
  - d) The Defendant's causing tortious injury in the Commonwealth of Massachusetts by an act or omission outside this commonwealth and regularly doing or soliciting business, or engaging in any other persistent course of conduct or deriving substantial revenue from goods used or consumed or services rendered, in the Commonwealth of Massachusetts, and set forth in Massachusetts General Laws, Chapter 223A, Section 3.
5. On or about January, 24, 2019, Plaintiff Sabrina Dix-Adams was the lawful operator of her motor vehicle which was traveling on Huntington Avenue in Boston, Suffolk County, Massachusetts.

6. On or about January 24, 2019, the Defendant Lindsey Lapides was the operator of a motor vehicle traveling on Huntington Avenue in Boston, Suffolk County, Massachusetts.
7. On or about January 24, 2019, the Defendant Anheuser Busch, LLC was the lawful owner of the motor vehicle being operated by Lindsey Lapides on Huntington Avenue in Boston, Suffolk County, Massachusetts.

**COUNT I**

8. The Plaintiff repeats and reavers paragraphs 1 through 7 as if realleged herein.
9. On or about January 24, 2019, the Defendant Lindsey Lapides negligently operated her vehicle without due care by proceeding through a red light thereby causing her to strike the vehicle operated by the Plaintiff.
10. As a direct and proximate result of the Defendant's negligence, the Plaintiff Sabrina Dix-Adams was caused to incur and continues to incur medical expenses, was caused to lose and continues to lose time and income from her employment and has suffered and continues to suffer an impairment to her ability to enjoy life and attend to her usual activities.
11. At all times material herein, the Plaintiff Sabrina Dix-Adams was in the exercise of due care and free from all comparative negligence.
12. The Plaintiff Sabrina Dix-Adams has satisfied all conditions precedent to the bringing of this cause of action.

WHEREFORE, the Plaintiff Sabrina Dix-Adams demands judgment against the Defendant, Lindsey Lapides in the amount of her damages, plus cost and interest and reasonable attorney's fees.

**THE PLAINTIFF DEMANDS A TRIAL BY JURY ON THIS CAUSE OF ACTION.**

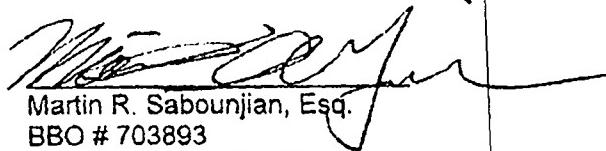
**COUNT II**

13. The Plaintiff repeats and reavers paragraphs 1 through 12 as if realleged herein.
14. As a direct and proximate result of the negligence of the person for whose conduct the Defendant Anheuser Busch, LLC was legally responsible, the Plaintiff Sabrina Dix-Adams was caused to incur and continues to incur medical expenses, was caused to lose and continues to lose time and income from her employment and has suffered and continues to suffer an impairment to her ability to enjoy life and attend to her usual activities.
15. At all times material herein, the Plaintiff Sabrina Dix-Adams was in the exercise of due care and free from all comparative negligence.
16. The Plaintiff Sabrina Dix-Adams has satisfied all conditions precedent to the bringing of this cause of action.

WHEREFORE, the Plaintiff Sabrina Dix-Adams demands judgment against the Defendant Anheuser Busch, LLC in the amount of her damages, plus cost and interests and reasonable attorney's fees.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON THIS CAUSE OF ACTION.

Respectfully Submitted,  
The Plaintiff,  
By her Attorney,



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